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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Section 73.21 and 73.37,)
of the Commission's Rules to Provide for Facilities)
Changes by Stations Operating in the Expanded)
AM Band (1605-1705 kHz))
)

MB Docket No. _____
RM-11136

To: Office of the Secretary
Audio Division

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COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

Mid-West Management, Inc. ("Mid-West"), the licensee of WTDY(AM), Madison, Wisconsin, an expanded band facility paired with WLMV(AM), Madison, Wisconsin, by its counsel, submits the following comments in response to the Commission's public notice of January 5, 2005 (Report No. 2686) inviting comments in response to the Petition for Rulemaking ("Petition") filed by InterMart Broadcasting of Georgia, Inc., Rama Communications, and Multicultural Radio Broadcasting, Inc. The Petition requests that the Commission initiate a rulemaking proceeding with the goal of applying the Class B radio rules to facilities in the AM Expanded Band.

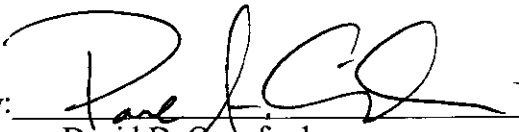
Mid-West hereby fully supports the Petition's proposal. Adoption of the rule changes proposed would place AM Expanded Band stations on equal footing with other AM stations and would provide AM Expanded Band stations with the flexibility to modify their facilities as necessary to better serve the public. Mid-West also agrees that the proposal would result in a more efficient use of the Commission's limited resources by allowing AM Expanded Band

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licensees to improve their stations' facilities without requiring the Commission to review onerous waiver requests. In sum, because the Commission's current rules do not reliably meet the needs of AM Expanded Band stations, Mid-West urges the Commission to initiate a Notice of Proposed Rulemaking consistent with the Petition's request.

Respectfully submitted,

MID-WEST MANAGEMENT, INC.

By: 
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Dated: February 4, 2005

CERTIFICATE OF SERVICE

I, Rhea Lytle, a secretary with the law firm of Shaw Pittman LLP, do hereby certify that a copy of the foregoing "**COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING**" was mailed, first class, postage prepaid this 4th day of January 2005 to the following:

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